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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PENDLETON DIVISION

OREGON FIREARMS FEDERATION, INC.,
et al.,

Plaintiffs,

v.

TINA KOTEK, et al.,

Defendants,

and

Case No. 2:22-cv-01815-IM (lead case)
3:22-cv-01859-IM (trailing case)
3:22-cv-01862-IM (trailing case)
3:22-cv-01869-IM (trailing case)

**DECLARATION OF JAMES
YURGEALITIS**

OREGON ALLIANCE FOR GUN SAFETY,

Intervenor-Defendant.

MARK FITZ, et al.,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, et al.,

Defendants.

KATERINA B. EYRE, et al.,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, et al.,

Defendants,

and

OREGON ALLIANCE FOR GUN SAFETY,

Intervenor-Defendant.

DANIEL AZZOPARDI, et al.,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, et al.,

Defendants.

I, James Yurgealitis, declare:

1. I am over the age of eighteen years of age, competent to testify to the matters contained in this declaration, and testify based on my personal knowledge, research, experience,

and information. The following statements are true and correct and, if called upon, I could competently testify to the facts averred herein.

2. I am currently self-employed as a Legal and Forensic Consultant, providing firearms related technical and public policy consulting, testing and training services to corporations, legal counsel, and the public sector. A detailed description of my work experience, education, and training are included in my Curriculum Vitae, which is attached as Exhibit A to this declaration. I have also included, as Exhibit B, a statement of my qualifications as an expert witness in the areas relevant to my experience.

3. I am a former Senior Special Agent/Program Manager for Forensic Services for the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), U.S. Department of Justice, a position I held for nine years prior to my retirement. In that capacity, I was responsible for all ATF firearms and forensic firearms related training and research at the ATF National Laboratory Center (NLC) in Ammendale, MD.

4. Prior to my tenure at the ATF NLC, I was employed as a federal law enforcement officer, in various capacities, for approximately 16 years.

5. As detailed in Exhibits A and B, I have extensive training and experience with respect to firearms in general, as well as their history, manufacture, operation, and use.

6. I have been engaged by the defendants in this matter to provide research and opinions related to Ballot Measure 114 (Measure 114). More specifically, I have been asked to provide information and opinions regarding Section 11 of Measure 114, which addresses the restrictions on large capacity magazines.

7. I am being compensated at a rate of \$400 per hour for my work on this report as well as any additional work required. My travel + work rate is \$1600 per day.

I. GENERAL FIREARMS TERMINOLOGY AND OPERATION

8. In discussing modern firearms, it is important to understand how they function and the differences between types commonly available to the public.

9. Modern Firearms operate utilizing the expanding gases generated by rapidly burning gunpowder contained in modern ammunition. Gunpowder (or smokeless powder) is the propellant contained within metallic cartridges or shotshells utilized by modern firearms. A single cartridge or shotshell is also referred to as a “round” of ammunition. Once chambered or loaded in a modern firearm, and the trigger is pulled, the primer at the base of the cartridge or shotshell is struck by a firing mechanism. The primer contains a pressure sensitive explosive compound which ignites when struck. The ignition of the primer, in turn, ignites the main powder charge contained in the case of the cartridge or shotshell. The main powder charge ignites and burns rapidly in what is essentially a contained explosion. This contained explosion generates gases at enormous pressures. The generated gases push the projectile out of the mouth of the cartridge, down the barrel of the firearm and out of the firearm through the muzzle.

10. More simply defined, a firearm is a weapon which utilizes the gas pressure generated by explosively burning gunpowder in a modern ammunition cartridge to propel a projectile through the barrel and out of the firearm through the muzzle.

11. All modern Breech loading firearms,¹ no matter the type, operate according to a nine-step process known as the “Cycle of Fire,” as identified by the Association of Firearm and Toolmark Examiners (AFTE), a professional organization for Forensic Firearm and

¹ A breech loading firearm is one in which the cartridge is loaded and fired from the breech (back) end of the barrel as opposed to a muzzle loader, in which the propellant or powder and projectile are loaded from the muzzle (front) end.

Toolmark Examiners that, in conjunction with the U.S. Department of Justice, National Institute of Justice, created a training program for apprentice forensic firearm and toolmark examiners. The AFTE training program describes the nine steps of the Cycle of Fire as:²

1) Feeding:

Feeding refers to the process for insertion of cartridges into the chamber; the breech bolt pushes the cartridge into final position. Typically, the incoming round slides across the bolt or breech face during this ca[ro]ming action. The feeding function can be manual or performed by various kinds of magazines and clips. For example, machine guns use belts of cartridges.

2) Chambering:

Chambering is the insertion of the cartridge into the chamber. If a cartridge of the incorrect length or diameter is used or if there is foreign matter in the chamber, chambering may be obstructed, causing a malfunction. Excess oil or grease in the chamber may cause overpressure, resulting in a ruptured cartridge case and potentially serious accidents.

3) Locking:

The breech bolt mechanism locks the cartridge into position in the barrel before firing. Most quality firearms are equipped with an interrupter mechanism that disconnects the trigger from the firing pin, thus making it impossible to fire until the mechanism is safely locked. This critical relationship is referred to as timing. . . .

4) Firing:

When the breech is fully locked, a pull on the trigger mechanically translates to the firing pin release. In the cocked position, the firing pin has a hammer behind it with a spring forcing it towards the primer, restrained only by a sear that is engaged by the trigger. A pull on the trigger trips the sear from the engaging notch in the hammer. The hammer, actuated by a cocked spring, drives the firing pin sharply against the percussion-sensitive primer, which fires the cartridge.

5) Obturation:

Obturation occurs when powder gases under high pressure (e.g., two and one-half tons per square inch in the .30-06 Springfield cartridge) are sealed to prevent them from jetting between primer cup and cartridge case, cartridge case and primer wall,

² *Cycle-of-Fire Steps*, Firearm Examiner Training (2008), https://projects.nfstc.org/firearms/module08/fir_m08_t04.htm.

and projectile and bore. Cartridge cases must be sufficiently flexible to expand against the chamber wall and transmit the instantaneous powder pressure to the barrel metal that surrounds the chamber. When the chamber pressure has returned to zero, the cartridge case must also be flexible enough to release itself from the chamber wall (even though it is now pressure-form-fitted to the chamber).

Likewise, the primer cup has been pressure-held against the side of the cartridge case and depends upon the face of the breechblock for locked support during the interval of high-chamber pressure.

Obturation also occurs with the projectile; bullets are made sufficiently larger than the bore diameter to extrude into the rifling grooves and seal the gases. The sharp hammer action of the instantaneous high pressure and temperature may upset the projectile base, which enhances sealing. Shotgun wads perform the sealing function in smooth bore weapons.

6) Unlocking:

This is the reverse of the locking process and is frequently performed in conjunction with extraction.

7) Extraction:

Although cartridge cases do not commonly exceed their elastic limit during firing, they have a tendency to stick to the chamber after firing. After firing, cartridge cases are larger in diameter than before firing. . . .

All cartridge cases are designed with a rim or groove (cannelure) at the base so that an extractor claw can grasp this edge in order to achieve extraction.

8) Ejection:

In the final stages of extraction, the cartridge case encounters a projection that is usually at right angles to the exit portal of the breech. Rotating on the fulcrum of the extractor the case base is contacted on the opposite side by the ejector, which flips the case out of the actuating mechanism.

9) Cocking:

The hammer spring is usually cocked when the bolt of a rifle, pistol, or repeater shotgun is retracted. . . . Exposed hammers may be cocked by manual retraction, using the thumb.

12. Additional definitions often used when classifying firearms (in general) are

Semiautomatic, Full Automatic and Select Fire:

- Semiautomatic: Refers to a repeating / self-loading firearm that fires one shot for each pull of the trigger until the ammunition supply is exhausted. The energy of the fired cartridge is utilized to cycle the mechanism of the firearm to feed and chamber the next shot.
- Full / Fully Automatic: Refers to a firearm that will continuously fire successive shots when the trigger is pulled, and will only stop when the trigger is released or the supply of ammunition is exhausted. Commonly referred to as a machine gun.
- Select Fire: A firearm capable of switching between and functioning in either fully automatic or semiautomatic fire mode. Alternatively, some firearms can fire in “burst mode” meaning automatically with a mechanical limitation on the number of shots.

13. Additional definitions relevant to any discussion regarding firearms in general are Rifling, Caliber, and Gauge.

- Rifling: Rifling refers to a series of grooves cut or impressed inside the barrel in a spiral pattern. The “high” portions of these patterns are called “Lands.” The “lower” portion of this pattern are called “Grooves.” When a projectile (or bullet) is fired in a rifled firearm it comes into contact with the lands as it leaves the chamber and begins to travel down the barrel. Because the lands are oriented in a spiral pattern, the rifling imparts a spin to the projectile, which improves stability and accuracy.
- Caliber: Caliber is a dimensional measurement of the inside (or bore) of a rifled barrel. In the United States caliber is traditionally expressed in fractions of an inch. For example, a .22 caliber firearm is designed to chamber and fire a projectile which measures .22 inches (or slightly less than a quarter of an inch). A .50 caliber firearm chambers and fires a projectile which is approximately a half inch in diameter.

In Europe, and the majority of other countries utilizing the metric system, caliber has historically been expressed in millimeters (mm). Therefore, a 9mm firearm is designed to chamber and fire a projectile with a diameter of 9mm. European caliber designations may also include measurement of the length of the cartridge case (9x19mm, 7.62x39mm, etc.)

- Gauge: Gauge is a dimensional measurement which is traditionally used to denote the bore of a non-rifled or “smoothbore” firearm (*i.e.* a Shotgun). Shotguns were initially designed to fire a mass of round shot as opposed to one solid projectile and, therefore, a caliber designation is not readily applicable. Gauge refers to the number of lead spheres which will fit inside the bore and equal one pound. For example, in a

12-gauge shotgun you can fit 12 spheres of lead, which are approximately 18.52mm or .73 inches in diameter, the total weight of which will equal one pound. If the diameter of the spheres is increased, it will require less of them to equal one pound. Therefore, the smaller the “gauge,” the larger the dimension of the bore. The exception to this measurement system is the .410 gauge shotgun which is actually a caliber designation.

14. It is important to note for the purposes of this report that the caliber designation of any given ammunition cartridge usually refers only to the diameter of the projectile (bullet) and not the relative “power” of the cartridge itself (in terms of muzzle energy, effective range and muzzle velocity). For example, there is a distinction between cartridges commonly referred to as .22 caliber and cartridges commonly referred to as .223 caliber.

15. .22 caliber ammunition is a popular and relatively low power cartridge developed in the 1880’s. It is also known as “.22 rimfire” as the primer mixture in the cartridge is seated in the rim of the cartridge and not contained in a separate primer cup in the cartridge base. It is commonly used for target shooting as well as hunting small game and can be fired from both handguns and rifles chambered in that caliber. Bullet weights for .22 caliber projectiles / bullets are typically between 30-60 grams (0.08 to 0.13 ounces). Muzzle velocities are usually in the 1100-1300 feet per second (fps) range.

16. .223 caliber ammunition by comparison is a high velocity cartridge developed in the 1950’s in part for use in the original AR-15 and M16 rifles. It is a “centerfire cartridge.” Although the diameter of the projectile / bullet is only slightly greater (approximately the width of a human hair) than the .22 caliber cartridge mentioned previously, it is a vastly more powerful cartridge in terms of muzzle velocity and range. This caliber ammunition is also known by its metric designation 5.56mm. Common bullet weights for .223 / 5.56mm caliber projectiles are 50 to 62 grams + or - (0.11 to 0.14 ounces) and common muzzle

velocities are approximately 3,200 to 3,500 fps. A heavier bullet and increased velocity equate to more of the cartridge's energy being transferred to the target.

II. TYPES OF MODERN FIREARMS

17. Modern firearms as currently manufactured for civilian ownership fall into two general types: Handguns and Long Guns (or shoulder weapons).

A. Handguns:

18. Handguns are generally defined as a firearm having a short stock (grip), and are designed to be held, and fired, with one hand. The term "handgun" defines two distinct types of modern firearms, the revolver and the pistol.

19. A revolver is a handgun designed and manufactured with a revolving cylinder to contain, chamber, and feed multiple rounds of ammunition. In a modern double action revolver, pulling the trigger rotates the cylinder bringing an unfired cartridge of ammunition in line with the barrel and firing pin. Pulling the trigger also cocks the hammer and then releases it either directly (or indirectly via a firing pin) to strike the primer of the cartridge initiating the firing sequence. In this type of revolver, the trigger must again be pulled to rotate the cylinder in order to fire another cartridge. When all cartridges have been fired, the cylinder is unlocked from the frame and swings out to facilitate removal of expended cartridge casings and insertion of unfired cartridges. The cylinder is then closed and relocked within the frame and the handgun is again ready to fire when the trigger is pulled.

20. A pistol is a handgun designed and manufactured with the firing chamber as an integral part of the barrel and utilizes a "box" magazine to contain and feed multiple rounds of ammunition. In this type of handgun, generally, the box magazine is inserted into the firearm, the slide or bolt is pulled back and released which springs forward and feeds a

cartridge into the chamber. When the trigger is pulled, a firing pin or striker is released which impacts the primer of the cartridge and initiates the firing sequence of the ammunition. In most pistols a portion of the recoil or gas pressure generated by firing the cartridge is utilized to move the slide rearward, extract and eject the expended cartridge case, and chamber another round from the magazine. This sequence can be repeated by pulling the trigger once for each shot. The pistol can then be reloaded by removing the empty magazine and inserting a loaded magazine (or refilling a permanently affixed magazine if the pistol is so configured).

B. Long Guns / Shoulder Weapons:

21. Long guns are generally of two distinct types: rifles and shotguns.

22. A rifle is a firearm that is designed and intended to be fired from the shoulder. It fires a single shot through a rifled bore for each pull of the trigger. A shotgun is a firearm which is also designed and intended to be fired from the shoulder. It fires either a number of ball shot (commonly termed “buckshot” or “birdshot”) or a single projectile (commonly termed a “slug”) through a smooth (non-rifled) bore for each pull of the trigger.

1. Rifles

23. In terms of “types” of rifle, there are numerous variations. All of these variations, generally speaking, are defined and distinguished by the way they are loaded and reloaded. For example, single shot rifles fire one shot for each pull of the trigger. They have no internal or external magazine capacity and must be reloaded with a new unfired cartridge by hand for each shot. Many of these have a hinged or “break open” receiver to facilitate loading and unloading.

24. A pump-action rifle requires the operator to manually manipulate a forearm piece which is traditionally found underneath the barrel. After firing, the forearm is pulled

backward which unlocks the bolt, extracts and ejects the fired cartridge case. Pushing the slide forward feeds an unfired cartridge from the magazine, cocks the firearm mechanism, and locks the bolt for a successive shot. Pump action rifles have been manufactured with both tubular and detachable box magazines.

25. Bolt-action rifles require the operator to manually manipulate the bolt of the rifle. After firing, the bolt is first unlocked from the chamber and then moved rearward. This action also extracts and ejects the expended cartridge case. The bolt is then moved forward, which feeds an unfired cartridge from the magazine into the chamber. Once the bolt is then again locked by the operator, it is ready to fire. Bolt action rifles usually have an internal fixed magazine or tubular magazine, which will facilitate reloading via manipulation of the bolt until that capacity is exhausted. Bolt action rifles were generally the choice of military forces, hunters, and sportsmen through the end of World War II.

26. A lever-action rifle is similar to the bolt action rifle in that the operator is required to manipulate the mechanism, or “action,” of the firearm. A lever at the bottom of the receiver of the rifle is manipulated in an up and down motion in order to unlock the bolt and move it rearward, extract and eject the expended cartridge case, feed an unfired cartridge into the chamber, and lock it. The operator’s action is required for each shot fired through the rifle. Generally speaking, lever action rifles are manufactured with tubular magazines which will vary in capacity depending on the caliber of the firearm.

27. A semiautomatic rifle utilizes the energy generated by the firing of the cartridge to power the cycle of fire. This is accomplished by siphoning off a portion of the gases generated by firing to operate the mechanism or by utilizing the recoil generated by firing much as in a semiautomatic pistol as described previously. Once a semiautomatic rifle is

loaded, the operation of this cycle of fire is not dependent on the operator to perform any portion of the process other than to pull the trigger. Semiautomatic rifles are, and have been previously, manufactured with both fixed internal magazines and a capacity to accept detachable external magazines. As such this type of rifle is capable of firing with each pull of the trigger until the supply of ammunition is exhausted.

28. As stated previously, the majority of military firearms until the end of World War II were bolt action. The exception to this rule was the United States entering the war with the semiautomatic M1 (Garand) .30-06 caliber rifle as standard issue. The Garand had a fixed internal magazine with an eight-round capacity. Since the end of World War II, virtually every military organization across the Globe has adopted a form of semiautomatic or select fire rifle.

2. Shotguns

29. Modern shotguns are generally classified and characterized by their operating system (*i.e.* the manner in which they function, are loaded and reloaded). Shotguns with multiple barrels are defined by placement or orientation of their barrels.

30. Single-shot shotguns function similarly to the single-shot rifle. They may have a hinged receiver which allows the operator to open the action at the chamber area to facilitate loading and unloading of the firearm. There are also single shot models that are loaded and unloaded through a bolt action mechanism and have no additional magazine capacity.

31. Bolt-action shotguns are manufactured, as stated above, as single shot, or with internal or detachable magazines to facilitate easier and faster reloading. They function in the same way as a bolt action rifle and require manual manipulation of the bolt by the operator to unload and reload.

32. Lever-action shotguns again function in the same fashion as a similarly designed rifle. Manual manipulation of the lever is required for successive shots.

33. Pump-action shotguns have the same general operating system as a similarly designed rifle. The “action” of the shotgun must be worked forward and back by the operator to unlock the bolt, extract and eject the expended shotgun shell, and reload and relock the bolt for firing.

34. Semiautomatic shotguns, as with their rifle counterparts, utilize energy (either recoil or gas pressure) generated by firing ammunition to “power” the operating system of the firearm. These are manufactured with a number of different magazines, both internal and fixed, as well as external and detachable. They are capable of firing a single shot with each pull of the trigger until the supply of ammunition in the magazine is exhausted.

35. Break-open, double barrel, and “tip up” shotguns have a hinged receiver which facilitates access to the rear of the chamber for unloading and reloading. They are manufactured in single shot and double barrel variations.

C. Other Types of Firearms:

36. There are additional types and classification of firearms not discussed at length here for brevity and because they are less relevant to my opinions.

III. LARGE CAPACITY MAGAZINES

37. Detachable magazines are ammunition feeding devices not permanently integrated or fixed to the firearm receiver or frame. Common types of firearms which utilize detachable magazines include semiautomatic pistols, semiautomatic rifles, bolt action rifles, machineguns, and numerous types of shotguns.

38. The operation (or cycle of fire) of any firearm designed and manufactured to accept a detachable magazine will function regardless of the maximum capacity of the magazine itself.

39. For example, firearms such as the Beretta Model 92 semiautomatic pistol and AR-15 type semiautomatic rifle will function as designed whether the operator utilizes a magazine limited to ten rounds or one of greater capacity. Generally speaking, any firearm capable of accepting a detachable magazine holding more than 10 rounds will also accept a magazine with a maximum capacity of ten rounds or fewer. This includes the vast majority of handguns and shoulder-fired firearms designed and manufactured to utilize detachable magazines.

40. Modern semiautomatic rifles that are designed, manufactured, and marketed as “hunting rifles” traditionally have had an internal magazine capacity of fewer than 10 rounds, depending on caliber. For example, the Browning BAR, as manufactured, has an internal magazine capacity of 4 rounds. Semiautomatic and pump action shotguns traditionally used for hunting have tubular magazines with a 5-7 round capacity.

41. Although technological advances in military firearms advanced at a rapid pace following WWII, large-capacity detachable magazines were not commonly marketed for the general public. For example, when Colt began production of the AR-15 (which became the M16) for the U.S. Military in the early 1960’s, it was initially issued with 20-round magazines. However, when Colt began marketing a “civilianized” semiautomatic variant for sale to the general public, it was sold with two five-round magazines, not the 20-round magazines issued with the rifle to the U.S. Military. The following image comes from Colt’s 1964 Dealer Catalog:



**COLT AR-15 SPORTER
SEMI-AUTOMATIC RIFLE
.223 CALIBER**

Colt's answer to the demand for a semi-automatic version of the AR-15 automatic rifle purchased by The United States Armed Forces. Painsstaking engineering redesign efforts have resulted in a Government-approved conversion of the Colt AR-15 automatic rifle without sacrificing any performance or weight characteristics. The semi-automatic AR-15 Sporter weighs only 6.3 pounds. Its recoil is light and barrel rise minimal.

MODEL R-6000

**RETAIL
PRICE***
\$189.50

Lightweight • Extremely accurate • Easy to handle • Straight line construction — barrel, bolt, recoil buffer unit and stock assembled in a straight line • Rapid semi-automatic fire is more controllable than with rifles of commercial design • Simple to maintain.

CALIBER	BARREL LENGTH	OVERALL LENGTH	CAPACITY	SIGHTS	SAFETY	WEIGHT
.223	21"	39"	5 rounds	Double tang rear peep sight adjustable for windage. Post type front sight adjustable for elevation.	Rotary safety—selector lever	Approx. 6¾ lbs.

*The suggested retail price of the Sporter is \$189.50 and includes two magazines (each blocked for five rounds), sling, flash suppressor, rubber recoil pad, cleaning rod assembly, cleaning brush, and the Colt AR-15 Sporter Operation and Maintenance manual.

Image Source: <https://thecoltar15resource.com/1964-catalog>

42. In 1994, Congress adopted the Violent Crime Control and Law Enforcement Act, (also know as the Federal Assault Weapons Ban or “AWB”), which limited the maximum capacity of a detachable magazine to ten rounds. As a result, numerous firearm manufacturers, as well as aftermarket magazine manufacturers, initiated production of what were colloquially termed “post ban” magazines to conform to the new legislation. Magazines with a capacity of over ten rounds were termed “Large Capacity Magazines”

(LCM). The post ban magazines were modified, or retooled, versions of existing large capacity magazines in order to keep their dimensions identical and ensure that the 10-round magazines functioned identically to existing LCMs in their firearms. For example, pictured below is a 10-round magazine for a Browning 9mm caliber “Hi Power” semiautomatic pistol:



Image Source: <https://www.brownells.com/magazines/handgun-magazines/magazines/magazine-10-round-browning-high-power>

43. And a 13 round capacity magazine for the same pistol:



Image source: <https://www.brownells.com/magazines/handgun-magazines/magazines/magazine-high-capacity>

44. You will note the 10-round magazine differs as a portion of the metal magazine body is replaced with a molded polymer plug. This modification effectively limits the interior volume and capacity of the magazine to 10 rounds. Manufacturers have also utilized various other methods to restrict magazine capacity, including dimpling the lower quadrant of the magazine body inwards, placing rivets in the magazine body, or thickening the walls of polymer bodied magazines to reduce capacity.

45. Following the expiration of the Federal Assault Weapons Ban, numerous states and localities enacted their own legislation, which also contained magazine capacity limitations.

46. As a result, many manufacturers of popular semiautomatic handguns and rifles during the Federal Assault Weapons Ban continued to offer “state compliant” versions to customers in states so affected. Manufacturers such as Glock, Sig Sauer (SIG), FN USA, Beretta, and Smith & Wesson, among numerous others, offer handguns and rifles compliant

with individual state regulations. Most major firearm manufacturers offer models that come “standard” with 10-round magazines.

47. Shown here is a page from the current online catalog of FN USA (the U.S. based subsidiary of Belgian arms manufacturer Fabrique Nationale) showing the “California Compliant” version of their “Five-seveN” pistol.



Image Source: <https://fnamerica.com/catalog-and-wallpapers/>

48. This is a page from Smith & Wesson’s online catalog showing a rifle with a 10-round capacity:

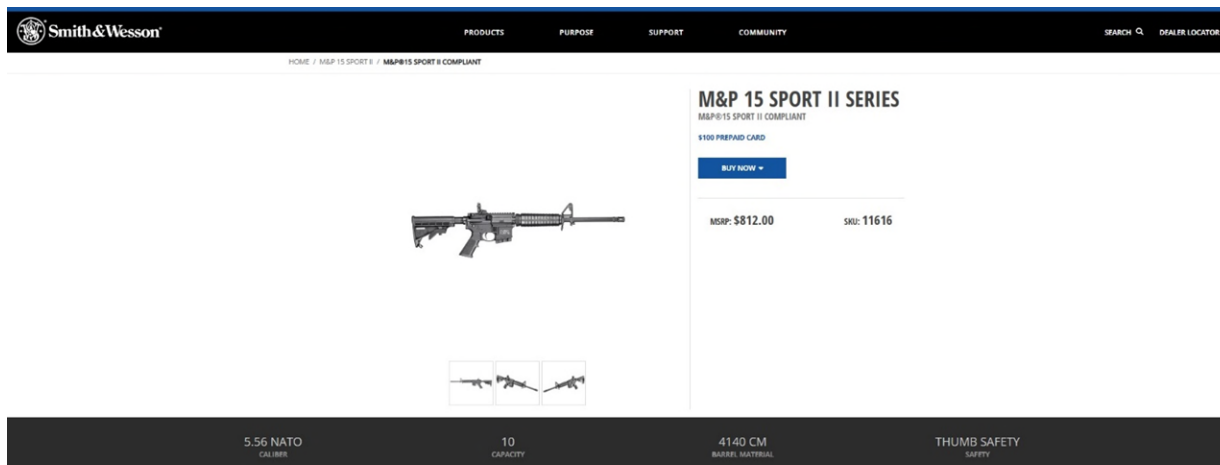


Image Source: <https://www.smith-wesson.com/product/m-p-15-sport-ii-compliant>

49. California Compliant Glock Pistols are also available online from dealers such as Sportsman's Warehouse:

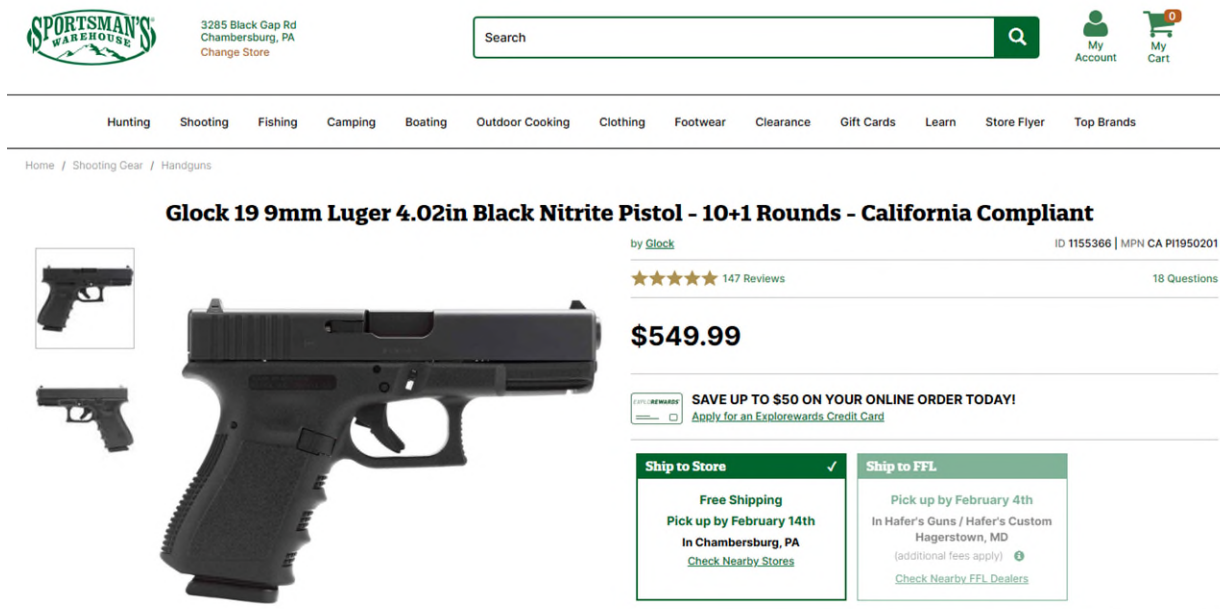


Image Source: <https://www.sportsmans.com/shooting-gear-gun-supplies/handguns/glock-19-9mm-luger-402in-black-nitrite-pistol-101-rounds-california-compliant/p/1155366>

50. Additionally, there are numerous aftermarket manufacturers who offer 10-round magazines specifically for use in firearms that come with LCMs. Mec-Gar, Magpul and ProMag are three examples.

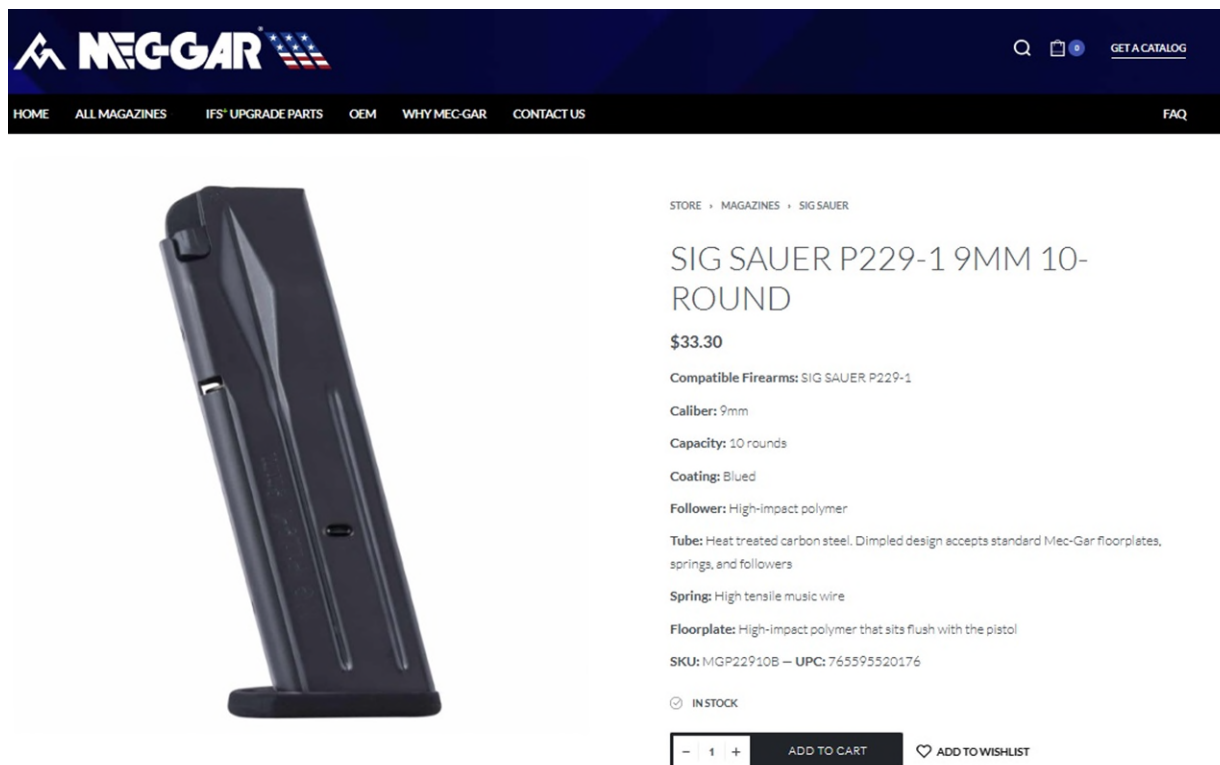


Image Source: <https://mec-gar.com/shop/magazines/sig-sauer/sig-sauer-p229-1-9mm-10-round/>

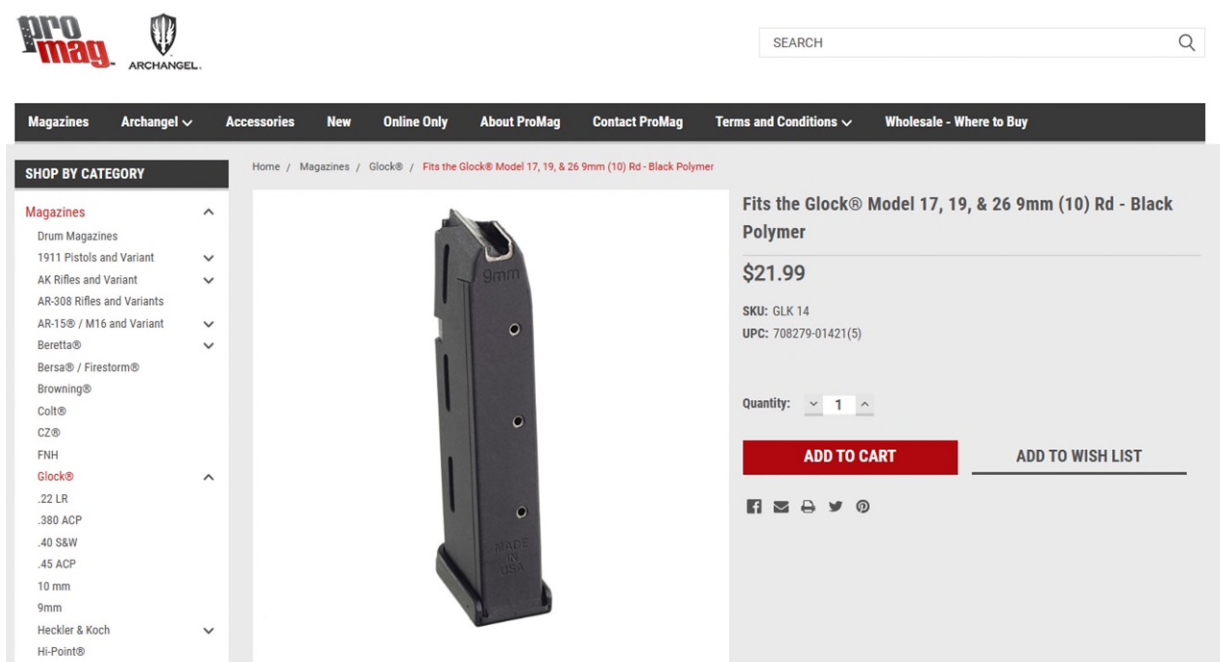


Image Source: <https://promagindustries.com/fits-the-glock-model-17-19-26-9mm-10-rd-black-polymer/>

51. I have fired a significant number of handguns and rifles with magazines of varying capacities. The capacity of the magazine did not affect the ability of those firearms to function as designed.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 5, 2023.

s/ James Yurgealitis
James Yurgealitis

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